


**ANNUAL REPORT ON THE IMPLEMENTATION
ON THE ENVIRONMENTAL TERMS FOR THE OPERATION AND MAINTENANCE OF THE "PATHE"
MOTORWAY, SECTION "SKARFEIA - RACHES" AND THE
MOTORWAY OF CENTRAL GREECE (E65), SECTION "LAMIA - KALAMPAKA"**

**PROJECT: "DESIGN - CONSTRUCTION - FINANCING - OPERATION - MAINTENANCE AND
EXPLOITATION OF THE PROJECT
'MOTORWAY OF CENTRAL GREECE (E65)'"**



Date	31.01.2026
Created:	Concessionaire 

**REFERENCE PERIOD
YEAR 2025**

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1. INTRODUCTION

This Environmental Management Report outlines the company KENTRIKI ODOS S.A.'s Environmental Management Processes during the operation and maintenance of the Concession Project for the year 2025 (01.01.2025 to 31.12.2025). This Report also includes the reference data on compliance with the environmental terms during the B' semester of 2025.



The company ODOS KENTRIKIS ELLADOS S.A. implements a programme for the monitoring of environmental impacts, in accordance with the Concession Agreement and the approved Environmental Terms of the project. The implementation of the programme is carried out in such a way that it provides multiple benefits to the man-made and natural environment of the areas of influence, as well as serving in the best possible way the user, in the section **Skarfeia - Raches (57 km) of the PATHE Motorway - E65** and in the section **Lamia - Kalampaka (136 km) of the E65 Motorway**.



The monitoring of environmental and social parameters is done in such a way that enables early recognition of harmful tendencies and permits the reduction and/or elimination of the negative effects, by intervening with suitable protective measures. Additionally, the constant monitoring enables the effectiveness assessment of the proposed protection measures, so



that the protection of the environmental parameters affected by the operation and maintenance of the motorway is ensured over time. The collection and recording of qualitative and quantitative data during constant E.T. monitoring also aims to contribute to the improvement of knowledge regarding the impacts that the construction

of such projects may have on a similar Environment.

At the PATHE motorway, section "Skarfeia - Raches" and on the E65 Motorway, section "Lamia - Kalampaka", a comprehensive environmental monitoring program is implemented, through which all Environmental Terms are met, as detailed below.

2. PROJECT DESCRIPTION

2.1 PATHE Motorway E65

State: Hellenic Republic

Concessionaire: ODOS KENTRIKIS ELLADAS S.A.

Motorway: PATHE

Section: Skarfeia - Raches

The PATHE motorway in the Skarfeia - Raches section includes:

1. 12 (twelve) Junctions

The PATHE motorway in the Skarfeia - Raches section includes:

- Skarfeia half-junction near K.P. 185+500
- Molos I/C near K.P. 190+500
- Thermopylae half-junction near K.P. 198+500
- Bralos I/C (Thermopylae) near K.P. 203+000
- E65 half-junction near K.P. 207+000
- Anthili half-junction near K.P. 210+000
- Roditsa I/C near K.P. 212+500
- Ag. Paraskevi I/C near K.P. 217+500
- Ag. Marina I/C near K.P. 223+500
- Stylida – Karavomylos I/C near K.P. 232+000
- Karavomylos – Achinos I/C near K.P. 237+000
- Raches half-junction near K.P. 241+000



2. 2 (two) Frontal 8 & (eight) Lateral Toll Stations

i. Frontal

- Agia Triada near K.P. 195+000
- Mavromantila near K.P. 220+000

ii. Lateral

- 2 on the Molos I/C near K.P. 190+500
- 2 on the Thermopylae I/C near K.P. 203+000
- 2 on the Ag. Marina I/C near K.P. 223+500
- 2 on the Karavomylos I/C near K.P. 232+000



3. 6 (six) Temporary Parking Areas – Parking

- Near K.P. 188+000 towards Lamia
- Near K.P. 188+000 towards Athens
- Near K.P. 221+500 towards Lamia
- Near K.P. 221+500 towards Athens
- Near K.P. 239+500 towards Lamia
- Near K.P. 239+500 towards Athens

4. 6 (six) Tunnels

- Near K.P. 225+800 to near K.P. 226+500, Bilaterally
- Near K.P. 227+500 to near K.P. 228+500, Bilaterally
- Near K.P. 228+500 to near K.P. 229+000 (towards Lamia)
- Near K.P. 228+700 to near K.P. 229+000 (towards Thessaloniki)

5. 3 Winter Maintenance Stations (WMS)

- Agia Triada WMS near K.P. 195+000
- Agia Marina WMS near K.P. 223+500
- Stylida WMS near K.P. 232+000

The sections of the Concession Contract Project are divided into five (5) Geographical Units (GU).

S/N	SECTION	Km
1	Skarfeia - Thermopylae	17.32
2	Thermopylae – Spercheios (excluding the bridge under construction by ERGOSE)	8.50
3	Spercheios – Ag. Paraskevi I/C	3.50
4	Ag. Paraskevi I/C – Ag. Marina I/C	8.50
5	Ag. Marina I/C – Raches	19.20

2.2 Motorway of Central Greece (E65)

The Motorway of Central Greece, Lamia – Kalampaka Section includes:

1. 12 Junctions

- Lamia I/C near K.P. 5+700
- Karpenisi I/C near K.P. 14+150
- Xyniada I/C near K.P. Ch. 31+750
- Smokovo half-junction near K.P. 48+100
- Anavra I/C near K.P. 60+250
- Sofades I/C near K.P. 71+900
- Karditsa I/C near K.P. Ch. 80+400
- Proastio I/C near K.P. Ch. 97+000
- Longos half-junction near K.P. Ch. 105+98
- Trikala I/C near K.P. 110+940
- Vasiliki I/C near K.P. 122+780
- Kalampaka I/C near K.P. 135+450



2. 3 Frontal and 4 Lateral Toll Stations

i. Frontal (2):

- Lianokladi near K.P. 17+000
- Sofades near K.P. 66+000
- Trikala near K.P. 105+500



ii. Lateral (3):

- 2 on the Anavra I/C near K.P. 61+000
- 2 on the Proastio I/C near K.P. 97+500
- 2 on the Trikala I/C near K.P. 111+500
- 2 on the Kalampaka I/C near K.P. 135+450

3. 3 Motorists Service Stations

- Lianokladi MSS near K.P. 12+500, bilaterally (it was delivered in early 2026)
- Sofades MSS near K.P. 70+500, bilaterally
- Trikala MSS near K.P. 116+600, unilaterally (not yet constructed)

4. 12 parking areas

- Near K.P. 130+300 towards Lamia
- Near K.P. 130+300 towards Egnatia
- Near K.P. 105+000 towards Lamia
- Near K.P. 102+000 towards Egnatia



- Near K.P. 86+500 towards Lamia
- Near K.P. 86+500 towards Egnatia
- Near K.P. 52+000 towards Lamia
- Near K.P. 52+000 towards Egnatia
- Near K.P. 35+000 towards Lamia
- Near K.P. 35+000 towards Egnatia
- Near K.P. 19+350 towards Lamia
- Near K.P. 19+350 towards Egnatia

5. Three Utilization & Maintenance Centres

- Lianokladi MCC near K.P. 12+800
- Sofades MCC near K.P. 70+500
- Kalampaka MCC (including Fire-fighting and Police Buildings) near K.P. 131+600



6. 3 Winter Maintenance Stations

- Xyniada WMS (near K.P. 43+500)
- Sofades WMS (same location as MCC/TMC/MSS) near K.P. 70+500
- Trikala WMS (near K.P. 105+500)



7. 3 Tunnels

- Twin tunnel (T2), 2,983 m in length, from K.P. 26+800 to K.P. 29+783
- Twin tunnel (T3A), 113 m in length, near K.P. 45+500
- Twin tunnel (T3), 387 m in length, near K.P. 46+000

8. 22 Bridges > 50 m

- Bridge approx. 150 m in length near K.P. 20+390
- Bridge appr. 200 m in length near K.P. 21+230
- Bridge appr. 200 m in length near K.P. 21+230
- Bridge approx. 100 m in length near K.P. 20+936
- Bridge appr. 90 m in length near K.P. 20+943
- Bridge appr. 90 m in length near K.P. 21+513
- Bridge appr. 70 m in length near K.P. 21+506
- Bridge approx. 100 m in length near K.P. 24+025
- Bridge appr. 100 m in length near K.P. 24+025
- Bridge appr. 70 m in length near K.P. 24+700
- Bridge approx. 70 m in length near K.P. 24+700
- Bridge appr. 140 m in length near K.P. 25+365



- Bridge appr. 140m in length near K.P. 25+365.00
- Bridge appr. 70 m in length near K.P. 48+500
- Bridge appr. 160 m in length near K.P. 49+000
- Bridge appr. 295 m in length near K.P. 51+000
- Bridge appr. 150 m in length near K.P. 54+000
- Bridge appr. 150 m in length near K.P. 55+500
- Bridge appr. 51.5 m in length near K.P. 70+500
- Bridge appr. 92 m in length near K.P. 90+000 (Kalentzis River)
- Bridge appr. 587 m in length near K.P. 103+500 (Pineios River)
- Bridge appr. 74 m in length near K.P. 110+500 (National Road Trikala – Larissa)

The kilometer points (K.P.) are presented in Appendix I.

It is noted that in April 2024, the new completed sections Lamia – Xyniada and Trikala – Kalampaka were opened to traffic (the middle Xyniada – Trikala section has been in operation since December 2017), resulting in the completion of the Central Greece Motorway (E65) from Lamia to Kalampaka, with a total length of 136 km. The completion of the E65, with its connection to the Egnatia Motorway, is expected within 2026.

3. SUPERVISORY SERVICES (PROJECT IMPLEMENTERS)

The Supervisory Services of the Concession Project are:

- **Special Service for Public Works / Construction of Transportation Projects with Concession Contract** (EYDE/KSESP), 5 Karystou St., 115 23, Athens,
- **Directorate D17, Directorate of Infrastructure Operation, Maintenance & Exploitation with Concession Contract**, 70 Panormou St., 115 23, Athens,

Concessionaire: ODOS KENTRIKIS ELLADAS S.A.

Motorway: PATHE (Skarfeia - Raches & E-65 (Lamia - Kalampaka)

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4. ENVIRONMENTAL AUTHORIZATION

4.1 JMD-ETA and their validity - Current Situation

4.1.1 PATHE: Skarfeia - Raches Section

S/N	Section	E.T. Validity	ET Decisions issued
1	Skarfeia - Thermopylae	The ETAD of the section is valid until 27-12-2028 (YPEN/G.D.P.P./DIPA Decision with Ref. No. YPEN/DIPA 96975/4083/27-12-2018)	<p><u>MAIN PROJECT</u></p> <ul style="list-style-type: none"> JMD Ref. No. 146113/12.07.2005, Approval of E.T. JMD Ref. No. 129696/06.06.2007. E.T. Amendment G.D.P.P./DIPA 96975/4083/27.12.2018. Amendment and renewal of E.T. G.D.P.P./DIPA 85272/3419/27.11.2018: Amendment of E.T. for the construction and operation of 6 parking areas. G.D.P.P./DIPA 3048/162/05.08.2020. Adaptation to the requirements of JMD 1915/2018 (B' 304). <p><u>ANCILLARY WORKS</u></p> <ul style="list-style-type: none"> EYPE 122881/08.03.2010, Environmental licensing of the Agia Triada and Molos I/C toll stations. YPEN/G.D.P.P./DIPA with Ref. No. YPEN/DIPA/100795/6801, submission of Technical Report for the restoration of excavation failures near K.P. 193+600 of the PATHE Motorway, near the Agia Triada Toll Station.
2	Thermopylae I/C – New Riverbed of Spercheios	The ETAD of the section is valid until 04/08/2027 (YPEN/G.D.P.P./DIPA Decision with Ref. No. YPEN/DIPA/28675/1671/01.08.2025)	<p><u>MAIN PROJECT</u></p> <ul style="list-style-type: none"> JMD Ref. No. 131550/04.03.2003, Approval of E.T. G.D.P.P./DIPA 146836/05.03.2015 Amendment and renewal of E.T. G.D.P.P./DIPA 3048/162/05.08.2020. Adaptation to the requirements of JMD 1915/2018 (B' 304). G.D.P.P./DIPA Decision with Ref. No. YPEN/DIPA/28675/1671/01.08.2025. Declaratory Act applying Article 2, para. 8a, of Law 4014/2011, as in force, for the

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			<p>extension of the duration of validity of the ETADs for the Concession project "Motorway of Central Greece (E65) from Thermopylae to Raches".</p> <p><u>ANCILLARY WORKS</u></p> <ul style="list-style-type: none"> EYPE 121668/08.02.2010, Environmental licensing of the toll station at the Thermopylae I/C location.
3	New Riverbed of Spercheios – Roditsa I/C	<p>The ETAD of the section is valid until 04/08/2027 (YPEN/G.D.P.P./DIPA Decision with Ref. No. YPEN/DIPA/28675/1671/01.08.2025)</p>	<p><u>MAIN PROJECT</u></p> <ul style="list-style-type: none"> JMD Ref. No. 146109/30.09.2005 Approval of E.T. G.D.P.P./DIPA 145496/21.01.2015. Amendment of E.T. G.D.P.P./DIPA 60908/1786/14.09.2018. Renewal of E.T. G.D.P.P./DIPA 3048/162/05.08.2020. Adaptation to the requirements of JMD 1915/2018 (B' 304). G.D.P.P./DIPA Decision with Ref. No. YPEN/DIPA/28675/1671/01.08.2025. Declaratory Act applying Article 2, para. 8a, of Law 4014/2011, as in force, for the extension of the duration of validity of the ETADs for the Concession project "Motorway of Central Greece (E65) from Thermopylae to Raches".
4	Lamia – Raches	<p>The ETAD of the section is valid until 04/08/2027 (YPEN/G.D.P.P./DIPA Decision with Ref. No. YPEN/DIPA/28675/1671/01.08.2025)</p>	<p><u>MAIN PROJECT</u></p> <ul style="list-style-type: none"> JMD 130665/02.05.2003 Approval of E.T. JMD 195214/11.01.2011, Amendment of E.T. G.D.P.P./DIPA 13590/15.03.2016, Renewal and amendment of E.T. G.D.P.P./DIPA 85272/3419/27.11.2018: Amendment of E.T. for the construction and operation of 6 parking areas. G.D.P.P./DIPA 3048/162/05.08.2020 Adaptation to the requirements of JMD 1915/2018 (B' 304). G.D.P.P./DIPA Decision with Ref. No. YPEN/DIPA/28675/1671/01.08.2025. Declaratory Act applying Article 2, para. 8a, of Law 4014/2011, as in force, for the extension of the duration of validity of the ETADs for the Concession project "Motorway of Central Greece (E65) from Thermopylae to Raches".

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5	Total Stylida – Karavomylos Bypass	The ETAD of the section is valid until 04/08/2027 (YPEN/G.D.P.P./DIPA Decision with Ref. No. YPEN/DIPA/28675/1671/01.08.2025)	<p><u>MAIN PROJECT</u></p> <ul style="list-style-type: none"> • JMD 100198/30.05.2006 Approval of E.T. • EYPE 172866/23.05.2014 – Amendment and renewal of E.T. • G.D.P.P./DIPA 12757/10.03.2016 – Amendment of E.T. • G.D.P.P./DIPA 85272/3419/27.11.2018: Amendment of E.T. for the construction and operation of 6 parking areas. • G.D.P.P./DIPA 3048/162/05.08.2020 Adaptation to the requirements of JMD 1915/2018 (B' 304). • G.D.P.P./DIPA Decision with Ref. No. YPEN/DIPA/28675/1671/01.08.2025. Declaratory Act applying Article 2, para. 8a, of Law 4014/2011, as in force, for the extension of the duration of validity of the ETADs for the Concession project "Motorway of Central Greece (E65) from Thermopylae to Raches". <p><u>ANCILLARY WORKS</u></p> <ul style="list-style-type: none"> • EYPE 121667/08.02.2010 – Environmental licensing of toll stations at the locations of the Ag. Marina–Stylida I/C and Stylida–Karavomylos I/C. • G.D.P.P./DIPA 77442/4790/07.08.2020 – Approval of the Technical Environmental Study (TE.PE.M.) for the winter maintenance station at the Agia Marina I/C (K.P. 223+320).
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4.1.2 E65: Lamia – Kalampaka Section

The following table presents, by section, the validity period of the approved E.T. for the Central Greece Motorway (E65) as well as the permits that have been issued:

S/N	Section	E.T. Validity	ET Decisions issued
1	Lamia – Makrychori	The ETAD of the section is valid until 16-12-2030. (YPEN/G.D.P.P./DIPA Decision with Ref. No. YPEN/DIPA 19921/991/18.09.2020)	<p>MAIN PROJECT</p> <ul style="list-style-type: none"> • JMD Ref. No. JMD ETA 144504/18.11.2005. Approval of E.T. • Decision of the Dir. General for the Environment, YPEKA, Ref. No. 167266/01.04.2013 – Amendment of the section of K.P. 0+000 – K.P. 14+500 (excluding the Lamia I/C). • M.D. 171820/04.04.2014. Amendment of E.T. regarding the exploitation of quarry sites. • M.D. 173471/27.06.2014. Amendment of sections K.P. 31+212 – K.P. 85+000 (excluding the section K.P. 47+313 – K.P. 51+483). • M.D. 147997/14.04.2015. Amendment of the section K.P. 47+313 – K.P. 51+483. • Decision of the Dir. General for the Environment, YPEN, Ref. No. 151991/16.12.2015. Extension of the validity period of E.T. • M.D. 24355/13.05.2016. Environmental licensing of the Lateral Toll Station at the Anavra I/C and the Frontal Toll Station at Sofades. • M.D. 61420/16.12.2016. Amendment in the section K.P. 14+500 – K.P. 31+212 and the Lamia I/C (K.P. 5+500). • M.D. 17095/04.04.2017. Amendment regarding the execution of water resource utilization works (water well drilling) in the prefectures of Fthiotida and Karditsa for the operational needs of the motorway • M.D. 21166/22.05.2017. Amendment regarding the incorporation of the permit for execution of water resource utilization works in the prefectures of Fthiotida and Karditsa

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		<p>for the operational needs of the motorway</p> <ul style="list-style-type: none"> • Decision of the Dir. Gen. of Environmental Policy, YPEN, oik. 22199/23.11.2017. Environmental licensing of the Xynias MSS and Sofades MSS. • Decision of the Dir. Gen. of Environmental Policy, YPEN, oik. 52131/22.12.2017 — Update of the final design of the section pf K.P. 31+212 – K.P. 85+000 • YPEN/DIPA/67165/2283-07-06-2019 — Amendment of the E.T. regarding the environmental licensing of a borrow pit at the location "Kalamaki", Agia Paraskevi, Municipality of Lamia. • Decision of the Dir. Gen. of Environmental Policy, YPEN, oik. 27870/1460/31.03.2020 — Amendment of the E.T. regarding the "Samolakas" construction site • Decision of the Dir. Gen. of Environmental Policy, YPEN 19921/991/18.09.2020 — Amendment of the E.T. regarding the update of the final design in the sub-section of K.P. 0+000 to K.P. 32+300. • Decision of the Dir. Gen. of Environmental Policy, DIPA, oik. YPEN/DIPA 15910/1074/06.05.2022 — Amendment of the E.T. regarding the update of Flood Protection Works: a) of the hydraulic design of the roadwork (additional/supplementary hydraulic technical works at specific locations in the sections from K.P. 0+000 to K.P. 24+000 and from K.P. 32+000 to K.P. 61+000), b) of the final design of the roadwork alignment (variation of the alignment from K.P. 19+000 to K.P. 23+500). • Decision of the Dir. Gen. of Environmental Policy, DIPA, oik. YPEN/DIPA 27738/1842/20.12.2022 — Amendment of the E.T. regarding the differentiations in the hydraulic design (additional/supplementary hydraulic technical works for flood protection in the sub-section from K.P. 61+056 to K.P. 85+000). • Ref. No. YPEN/DIPA/38901/2667/23.04.2023 Decision — Differentiations to the environmentally approved design pursuant to para. 1a of Article 6 of Law 4014/2011 (A'209) as in force, for the construction of three additional technical works on branch AB of the Lamia I/C (K.P. 5+900, E65 Motorway) and minor-scale differentiations
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			<p><u>ANCILLARY WORKS</u></p> <ul style="list-style-type: none"> Decision of the Dir. Gen. of Environmental Policy, YPEN, No. oik. 5396/07-02-2017: TEPEM approval for the installation and operation of the Traffic Management Centre within the Sofades MCC near K.P. 69+700 of the E-65. Decision of the Dir. Gen. of Environmental Policy, YPEN oik. 77444/4791/07.08.2020: TEPEM Approval of the Lianokladi MCC and Police Building.
2	Makrychori – Kalampaka	<p>The ETAD of the section is valid until 16-12-2030. (YPEN/G.D.P.P./DIPA Decision with Ref. No. YPEN/DIPA/83863/5738/18.09.2023)</p>	<p><u>MAIN PROJECT</u></p> <ul style="list-style-type: none"> JMD ETA 145521/18.11.2005. Approval of E.T. Decision of the Dir. General for the Environment, YPEKA, Ref. No. 203583/04.12.2012. Regarding the construction of the C-C at K.P. 137+000. Decision of the Dir. General for the Environment, YPEKA, Ref. No. 172041/26.11.2013. Amendment of the section of K.P. 85+800 – K.P. 137+550 (excluding the sections of K.P. 115+100 – K.P. 118+043 and K.P. 131+475 – K.P. 132+420). Decision G.D.P.P./DIPA, Ref. No. 151991/16.12.2015. Extension of the validity period. M.D. 17095/04.04.2017. Amendment regarding the execution of water resource utilization works (water well drilling) in the prefectures of Fthiotida and Karditsa for the operational needs of the motorway. M.D. 21166/22.05.2017. Amendment regarding the incorporation of the permit for execution of water resource utilization works in the prefectures of Fthiotida and Karditsa for the operational needs of the motorway Decision of the Dir. Gen of Environmental Policy, Ref. No. 52133/22.12.2017. Update of the final design. G.D.P.P./DIPA 95851/4000/21.12.2018. Amendment of E.T. and licensing of the Trikala MSS. G.D.P.P./DIPA Decision 76887/4751/05.08.2020 on the adaptation to the requirements of JMD 1915/2018 (Government Gazette 304B/2018) of the E-65 Motorway.

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			<ul style="list-style-type: none"> G.D.P.P./DIPA Decision 83863/5788/18.09.2023. Amendment of ETAD for the Makrychori–Kalampaka section (JMD 145521/18.11.2005) regarding the canalization works for sections of the Kalentzi and Pamisos rivers, collector drains and ancillary works – Canalization, Maintenance and Cleaning Works for Drainage Ditches. <p><u>ANCILLARY WORKS</u></p> <ul style="list-style-type: none"> G.D.P.P./DIPA Decision with Ref. No. YPEN/DIPA 16421/912/27.02.2025, approval of the TEPEM for the Kalampaka Police Station near K.P. 135+900 of the Central Greece Motorway E65, concerning the addition of a fuel supply station for the needs of the Hellenic Police vehicles
3	Kalampaka – Egnatia	<p>The ETAD of the section is valid until 21-05-2028.</p> <p>(YPEN/G.D.P.P./DIPA Decision with Ref. No. oik. 9728/21-05-2018)</p>	<ul style="list-style-type: none"> JMD 147014/18.11.2005. Approval of E.T. JMD 151991/16-12-2015 – Extension of the validity period of E.T. G.D.P.P./DIPA 9728/21.05.2018 – Approval of new E.T. due to amended design, with revocation of JMDs 147014/18.11.2005 and 151991/16-12-2015.

4.2 Submissions

First Semester 2025

For the **PATHE Motorway, Skarfeia – Raches Section**, no environmental studies relating to the Operation & Maintenance of the Concession Project were submitted by the Concessionaire during the first semester of 2025.

For the **E65 Motorway**, the following environmental studies were submitted by the Concessionaire during the reference period (first semester of 2025):

- Submission of TEPEM for the installation of a fuel supply station in the grounds of the Kalampaka Traffic Police station, at K.P. 135+900 of the E65 motorway.
[Concessionaire to EYDE/KSESP with Ref. No. 24409/05.02.2025 and EYDE/KSESP to G.D.P.P./DIPA with Ref. No. F9.18/24397/10.02.2025].
The TEPEM was approved by the G.D.P.P./DIPA decision with Ref. No. YPEN/DIPA 16421/912/27.02.2025.

Second Semester 2025

For the **PATHE Motorway, Skarfeia – Raches Section**, no environmental studies relating to the Operation & Maintenance of the Concession Project were submitted by the Concessionaire.

For the **E65 Motorway**, the following environmental studies were submitted by the Concessionaire during the reference period:

- Submission of a TEPEM for the Karperos MCC (at K.P. 162+000–162+100) in section S3 Kalampaka – Egnatia of the E65.
[Concessionaire to EYDE/KSESP with Ref. No. 24693/31.07.2025 and EYDE/KSESP to G.D.P.P./DIPA with Ref. No. F9.18/131768/06.08.2025].

4.3 Outstanding issues

4.3.1 PATHE: Skarfeia - Raches Section

All environmental studies submitted for the PATHE Motorway, Skarfeia – Raches Section have been approved and the issuance of E.T. has been completed.

4.3.2 E65: Lamia – Kalampaka Section

The following table presents the environmental studies that have been submitted for the E-65 Motorway, Lamia – Kalampaka Section, for which the issuance of E.T. has not yet been completed.

S/N	Section	Outstanding issues	Submissions	Observations
1	E65 - Section S2: Makrychori – Kalampaka Section, sub-section K.P. 88+237 – K.P. 89+919.	Submission of an Environmental Impact Study for the amendment of JMD ETA 145521/18-11-2005, as amended and in force, with respect to the required flood protection works along the Central Greece Motorway.	<ul style="list-style-type: none"> Submission by Kentriki Odos S.A. to EYDE/KSESP with Ref. No. 0800/29.10.2018. Submission of EYDE/KSESP to G.D.P.P./DIPA with Ref. No. F1/7986/31.10.2018. 	Approval from DIPA is pending
2	E65 - Section S2: Makrychori – Kalampaka Section	EIA for the amendment of the ETAD of E65 for the Makrychori–Kalampaka section (JMD 145521/18.11.2005) regarding the river canalization works on the Enipeas River.	<ul style="list-style-type: none"> Submission by Kentriki Odos S.A. to EYDE/KSESP with Ref. No. 23653/23.09.2023. Submission of EYDE/KSESP to G.D.P.P./DIPA with Ref. No. F9.18/56916/26.02.2024 	Approval from DIPA is pending
3	E65 - Section S3: Kalampaka – Egnatia Section	TEPEM for the Karperos MCC (at K.P. 162+000–162+100)	<ul style="list-style-type: none"> Submission by Kentriki Odos S.A. to EYDE/KSESP with Ref. No. 24693/31.07.2025. Submission of EYDE/KSESP to G.D.P.P./DIPA with Ref. No. F9.18/131768/06.08.2025. 	Approval from DIPA is pending

5. SENSITIVE AREAS OF THE PROJECT

The following table presents the natural areas under protection that the motorway passes through or is adjacent to.

S/N	Section	Natura 2000 Area
1	Skarfeia – Thermopylae	<ul style="list-style-type: none"> • Spercheios Valley and Estuary – Maliakos Gulf (GR2440002)
2	Thermopylae – Spercheios (excluding the bridge under construction by ERGOSE)	<ul style="list-style-type: none"> • Spercheios Valley and Estuary – Maliakos Gulf (GR2440002) • Lower Reaches and Estuary of the Spercheios River (GR2440005)
3	Spercheios – Ag. Paraskevi I/C	<ul style="list-style-type: none"> • Spercheios Valley and Estuary – Maliakos Gulf (GR2440002)
4	Ag. Paraskevi I/C – Ag. Marina I/C	<ul style="list-style-type: none"> • Spercheios Valley and Estuary – Maliakos Gulf (GR2440002)
5	Lamia – Makrychori	<ul style="list-style-type: none"> • Spercheios Valley and Estuary – Maliakos Gulf (GR2440002)
6	Makrychori – Kalampaka	<ul style="list-style-type: none"> • Antichasia Mountains & Meteora (GR1440005) • Antichasia Mountains & Meteora – Melissotrypa Cave (GR1440003)



6. ATMOSPHERIC POLLUTION

The approved environmental terms do not provide for the implementation of an air quality monitoring programme for the PATHE section (Skarfeia–Raches).

In accordance with the environmental terms and the relevant approvals, one Atmospheric Pollution Monitoring Station has been installed on the Makrychori – Kalampaka section of the E65 Motorway. The station is installed in the Sofades Geographical Unit, at the entrance of the adjacent Motorway Service Station. The station was put into trial operation on 15/3/2019.

For the year 2025, the atmospheric pollution monitoring programme was implemented by the above-mentioned atmospheric pollution monitoring station, which operates on a 24-hour basis. The atmospheric pollution report is in the process of being submitted by the Concessionaire to the competent Authorities. A corresponding report will be prepared and submitted for 2026 as well.

For the measurement of pollutants, the station has been equipped with analysers approved in accordance with National Legislation (MD H.P. 14122/549/E.103/2011 (Government Gazette 488/B'/30.3.2011) – Measures for the improvement of air quality, in compliance with the provisions of Directive 2008/50/EC "on atmospheric air quality and cleaner air for Europe" of the European Parliament and of the Council of the European Union of 21 May 2008). Specifically, the following are recorded every 24 hours at each station:

1. The pollutants PM₁₀, PM_{2.5}, CO, NO, NO₂, NO_X, SO₂, C₆H₆ (Benzene)
2. The meteorological conditions at each installation area.

The pollutants are measured continuously throughout the day. The recording system installed at each station and connected to the analysers calculates the mean primary pollution values every five minutes. These measurements are transmitted to the central computer of the atmospheric pollution monitoring system via a fibre optic network, where they are stored. At the end of each month, the measurements are corrected on the central computer of the network. The corrections include calibration results and the limit and drift corrections of the analyzers. After corrections, the average hourly, eight-hour, and 24-hour values of pollutants (NO₂, CO, SO₂, Benzene, suspended particles PM₁₀ and PM_{2.5}) are calculated and stored. For 2025, the measured pollutant records were as follows:

Suspended Particles PM₁₀

The Limit as of 01/01/2005 for PM₁₀ particles is 50µg/m³ on average daily value and should not be exceeded more than 35 times per year. In addition, the average annual value should not exceed 40 µg/m³.

Number of exceedances of daily average PM₁₀ values measurement above 50 µg/m³

Number of exceedances	Sofades
Average daily value in µg/m ³	2

➤ **The average daily value (50µg/m³) was not exceeded > 35 times per year.**

The average annual value for 2025 was:

Average annual value in µg/m ³	Sofades
	14.48

➤ **The average annual value (40 µg/m³) was not exceeded.**

Suspended Particles PM_{2.5}

For suspended particles PM_{2.5}, the Limit as of 01/01/2020 is 20 µg/m³ on the average annual value.

The average annual value for 2025 was:

Average annual value in µg/m ³	Sofades
	11.18

➤ **The average annual value (20 µg/m³) was not exceeded.**

NO₂

The Limit as of 01/01/2010 is 200 µg/m³ on average hourly value and should not be exceeded more than 18 times per year. In addition, the average annual value should not exceed 40 µg/m³.

Number of exceedances of the average hourly value above 200 µg/m³

Number of exceedances of the average hourly value in µg/m ³	Sofades
	0

➤ **The average hourly value (200 µg/m³) was not exceeded > 18 times per year.**

The average annual value for 2025 was:

Average annual value in µg/m ³	Sofades
	5.70

➤ **The average annual value (40 µg/m³) was not exceeded.**

CO

The Limit as of 01/01/2005 is 10 mg/m³ (maximum daily eight-hour value).

Number of exceedances of measurement above 10 mg/m³

Number of exceedances of the eight-hour maximum daily value in mg/m ³	Sofades
	0

➤ **The maximum daily eight-hour value of (10 µg/m³) was not exceeded.**

The average annual value for 2025 was:

Average annual value in µg/m ³	Sofades
	0.11

SO₂

The Limit as of 01/01/2010 is 350 µg/m³ as average hourly value and should not be exceeded more than 24 times per year. Also, the average daily value is 125 µg/m³, which should not be exceeded more than 3 times per year.



Number of exceedances of the average hourly measurement above 350 µg/m³

Number of exceedances	Sofades
Average hourly value in mg/m ³	0

➤ **The average hourly value (350 µg/m³) was not exceeded > 24 times per year.**

The average daily value for 2025 was:

Average daily value in µg/m ³	Sofades
	2.17

➤ **The average daily value (125 µg/m³) was not exceeded > 3 times per year.**

Benzene

The limit as of 01/01/2010 is 5 µg/m³ on average annual value.

The average annual value for 2025 was:

Average annual value in µg/m ³	Sofades
	0.84

➤ **The average annual value (5 µg/m³) was not exceeded.**

- **The air pollutant monitoring programme – Mobile Measurements**

In the approved environmental terms of the amendment to JMD No. 145521/18.11.2005, with Online Publication Number: 9RB24653P8-NAH dated 15/09/2023, environmental term 41 states that:

41. For the environmental monitoring of atmospheric environment in the immediate project area during operation, measurements of pollutants CO, BTEX, NOX/NO₂, O₃, PM₁₀ and PM_{2.5} shall be carried out (either via permanent monitoring stations or via a mobile monitoring station), guided primarily by annual traffic volumes and within the framework of meeting the obligations arising from applicable legislation. In accordance with Directive 2008/50/EC and its transposition into Greek legislation via Government Gazette 488B_2011, Appendix I concerning data quality objectives for indicative measurements of pollutants and their frequency, states that these may be carried out over 8 weeks evenly distributed throughout the year. A portable analyzer was used to monitor concentrations of particulate matter PM₁₀ – PM_{2.5}, NOX/NO₂ and O₃, specifically the STATIC NODE MK2 model manufactured by BETTAIR.

The dispersion analysis and assessment for the produced pollutants was carried out using the model provided by the company Wolffell, which offers a range of computational solutions for atmospheric pollution. Specifically, the IMMI PREMIUM software was used, which offers a wide range of computational and spatial capabilities and is suitable for complex pollution scenarios from multiple sources.

IMMI PREMIUM is a widely known computational tool created to introduce modern modelling concepts into air quality assessment, and it has effectively incorporated into its dispersion mechanisms aspects such as planetary boundary layer turbulence, fundamental scaling concepts, including the ability to parameterize emission sources, the integration of meteorological data, and terrain morphology analysis. With regard to the latter in particular, IMMI PREMIUM offers two input data mechanisms that constitute regulatory elements of the model: (1) a meteorological data pre-processor and (2) a terrain data pre-processor that incorporates complex terrain using USGS elevation data.

The monitoring programme was conducted at two locations (Trikala MSS & Trikala Toll Station) and had a total duration of 8 weeks.

The average values of measurements for the two cycles were:

TRIKALA MSS – MEASUREMENTS					
Average	PM10(μg/m ³)	CO(mg/m ³)	NO ₂ (μg/m ³)	O ₃ (μg/m ³)	BTEX(μg/m ³)
	22.5	0.3	31.6	40.2	0.2
TRIKALA TOLL STATION – MEASUREMENTS					
Average	PM10(μg/m ³)	CO(mg/m ³)	NO ₂ (μg/m ³)	O ₃ (μg/m ³)	BTEX(μg/m ³)
	22.4	0.2	24.1	38.1	0.3

After entering the data into the atmospheric pollution dispersion prediction model, the corresponding results were the following:

TRIKALA MSS – MODEL					
2025	PM10(μg/m ³)	CO(mg/m ³)	NO ₂ (μg/m ³)	O ₃ (μg/m ³)	BTEX(μg/m ³)
	20.64	0.28	24.08	38.2	0.2
TRIKALA TOLL STATION - MODEL					
2025	PM10(μg/m ³)	CO(mg/m ³)	NO ₂ (μg/m ³)	O ₃ (μg/m ³)	BTEX(μg/m ³)
	23.1	0.3	25.08	34.5	0.28

As is evident, there is full agreements between the results of the measurement and the model. The measurements for all cycles and all pollutants are below the statutory limits.

7. NOISE AND TRAFFIC VOLUME

In 2025, the 24-hour acoustic measurements carried out under the monitoring programme were as follows:

- **9 24-hour** traffic noise measurements at the PATHE Motorway, **Skarfeia - Raches section**
- **10 24-hour** traffic noise measurements at the E65 Motorway, **Lamia - Kalampaka section**

A total of **19 24-hour** traffic noise measurements were obtained, and the result assessment of the 24-hour traffic noise measurements for 2025 shows that:

A. "Skarfeia–Raches" Section

In this section, across all 9 24-hour traffic noise measurements, there is **NO exceedance** and no measures are required.

B. "Lamia–Kalampaka" Section

In this section, across all 9 24-hour traffic noise measurements, there is **NO exceedance** and no measures are required.



The above measurements were carried out in accordance with the specifications and requirements of the applicable legislation. Specialised scientific equipment was used for their execution, complying with all international standards and guidelines provided for under European and Greek legislation. For the year 2025, the Annual Noise monitoring programme was submitted to the Directorate of KAPA/YPEN and approved with Ref. No. YPEN/DKAPA/88337/1584/02.09.2025. A corresponding report will be prepared and submitted for 2026 as well.

The noise measurement results and records of the road traffic volume, with the position, date, and measurement time interval, the prevailing meteorological conditions, the contact details and name of the measurement manager were recorded in a results sheet. In the case of systematic exceedances of the applicable limit for road traffic noise, the construction and operation entity of the project must immediately take the appropriate measures to address the exceedance.

Before each 24-hour traffic noise measurement, calibration of the instruments was performed using a specific acoustical calibrator, so that the reliability of the results might be monitored during the recordings of the traffic noise environment.

The following are mentioned for all measurement positions: the exact position, the exact time-period and day of measurement, while it is noted that the measurements were performed under conditions of absence of rain and strong wind, while for conditions of light wind with speed < 3 m/sec, the use of a special windbreaker cover for the microphone was always ensured. No traffic noise recordings were performed if other sources of noise pollution were noted in the immediate environment of the recording position, e.g. residents gatherings, construction of roads, buildings etc., or if the traffic flow was not the usual (e.g. weekends or holidays), or if the smooth traffic flow was interrupted or disturbed from any random event, such as accident, etc.



In every 24-hour measurement, the following were recorded:

- the percentile indexes L1, L10, L50, L95, L99 as well as the maximum (Lmax) and minimum values (Lmin),
- the R.T.N. (Road Traffic Noise) level L10 (18-hour) & the level A-weighted equivalent LAeq (08.00–20.00),
- the level A-weighted equivalent LAeq (24h) and finally
- the Lden, Lday, Levening & Lnight indexes, as well as the Ld-e of existing legislation in accordance with JMD with No. oik. 211773/2012 (Government Gazette 1367/B/27-4-2012).

For the year 2025, the Road Traffic Noise Monitoring programme has been completed. For the year 2026, a similar programme shall be implemented, which is expected to be completed within the year (recording of 24-hour measurements in selected positions), when it shall be submitted to the Directorate of KAPA/YPEN for approval.

Finally, it is noted that the traffic volume is monitored daily at the section both on the PATHE motorway, "Skarfeia - Raches" section and on the Central Greece motorway (E65), "Lamia - Kalampaka" section at the level of passages from all toll stations and monthly reports are submitted. For 2025, the Annual Average Daily Traffic was calculated for the PATHE motorway, "Skarfeia - Raches" section is estimated at 13,047 passages in both directions, while for the Central Greece Motorway (E65), "Lamia-Kalampaka" at 4,033 passages in both directions.

Tables showing the kilometre positions of the 24-hour measurements across all sections of the motorway are presented below. In more detail:

Section: Skarfeia -Raches

MEASUREMENT S/N	AREA	DIRECTION	KM
P1	Anthili	Towards Lamia	209+400
P2	Anthili	Towards Lamia	209+800
P3	Roditsa	Towards Athens	213+900
P4	Megali Vrysi	Towards Athens	215+330
P5	Megali Vrysi	Towards Athens	215+700
P6	Stylida	Towards Raches	227+100
P7	Stylida	Towards Raches	227+200
P8	Stylida	Towards Raches	228+300
P9	Stylida	Towards Athens	232+600

Section: Lamia - Kalampaka

MEASUREMENT S/N	AREA	DIRECTION	KM
P10	Anavra	Towards Kalampaka	57+150
P11	Anavra	Towards Kalampaka	58+100
P12	Anavra	Towards Lamia	59+300
P13	Mavrachades	Towards Lamia	66+750
P14	Ag. Theodoros	Towards Lamia	80+100
P16	Longos	Towards Kalampaka	106+000
P17	Lamia	Towards Lamia	6+-870
P18	Raxa	Towards Lamia	119+810
P19	Vasiliki	Towards Kalampaka	124+540
K-4	Community of STYRFAKAS	Towards Lamia	23+500

8. WASTE MANAGEMENT

8.1 Liquid wastes

A comprehensive Environmental Management Plan has been developed and implemented, which includes the procedure for the management of hazardous liquid wastes in accordance with the environmental terms and the existing legislation, while evidence of proper management is requested from the subcontractors. A relevant database containing the agreements and waste delivery receipts of authorized mineral oil management companies has been established.

As for the hazardous liquid wastes (engine oil, gearbox oil, lubrication, etc.) resulting from the operation and maintenance works on the motorway, the concession company follows all procedures provided for by the current legislation and cooperates with management entities authorized for environmental purposes, and their quantities and distribution method are recorded in the respective approved Alternative Management System.

8.2 Solid wastes

There is cooperation with a Subcontractor for the cleaning and the collection of solid wastes from the motorway, which are then transferred to appropriate licensed premises.

For the hazardous solid wastes resulting from the operation and maintenance works on the motorway, all procedures provided for by the current legislation are followed and there is cooperation with management entities authorized for environmental purposes.



Additionally, fluorescent tubes and other mercury-containing wastes, lead-acid batteries, collected tires from the motorway, iron and steel, plastic, animal tissue waste (dead animals), plant tissue waste, and general waste refer to the waste generated from the operation and maintenance activities of the motorway, and their quantities and distribution method are recorded in the respective approved Alternative Management System.

Moreover, ODOS KENTRIKIS ELLADOS S.A., as part of its corporate social responsibility, has entered into agreements with companies from the Alternative Management System and conducts recycling for paper, plastic, batteries, used/damaged electrical and electronic equipment, and toners. Furthermore, ODOS KENTRIKIS ELLADOS S.A. has an Environmental Management System certified according to ISO 14001/2015 standard.



Lastly, it should be noted that as part of the Environmental Monitoring, on-site inspections are conducted at the maintenance work sites and the corresponding check list is filled in. Based on the checks, in case of failure to comply with the provisions, guidelines (corrective actions) for compliance are provided. The implementation of the corrective actions is checked through new inspections based on the checklist.

8.3 Waste producer table - EWR

Pursuant to Article 42, of Law 4042/2012 (Government Gazette 24/A/13.02.2012), as amended by Article 157, para. 1 of Law 4389/2016 (Government Gazette 94/A/27.05.2016) and JMD 1/1 (Government Gazette 1/B'/04.01.2017), the Electronic Waste Registry was established, and by JMD Oik. 43942/4026 (Government Gazette B' 2992/19.09.2016), liable for the electronic recording and registration are every organization or enterprise the establishments of which produce waste and falling within the scope of Chapter A of Law 4014/2011 (A' 209).

ODOS KENTRIKIS ELLADOS S.A. was registered in the Electronic Waste Registry (Ref. No 3959), as it falls within the scope of the provisions of Law 4014/2011, since in accordance with the No. DIPA/oik. 37674/2016 (Government Gazette 2471/B/10.08.2016), the motorways fall under Group 1 projects (Land and air transportation projects) – Road building, S/N 1, and under subcategory A1.

For the year 2024, the Concession Company submitted the relevant report of waste producer to the electronic waste registry (EWR) for every JMD ETA of the Concession Project separately. For 2025, the process is expected to be completed in accordance with the deadlines.

For all previous years (before the operation of EWR), ODOS KENTRIKIS ELLADOS S.A. has prepared and submitted the relevant reports for waste producer pursuant to JMD 13588/725/06 and on the basis of Law 2939/2001 (and its amendment Law 3854/2010).

9. CLEANING AND MAINTENANCE

The cleaning and maintenance work taken place during 2025 and for which the compliance with the Environmental Terms was checked, are the following

- Vegetation pruning and maintenance.
- Drain and culvert cleaning and maintenance.
- Advertising billboard removal.
- Sweeping.
- Parking Area cleaning and washing.
- Bins replacement.
- Metal safety rails replacement.
- Metal safety rails repair.
- Fence repairs due to accidents.
- Rodent extermination and inspection of tunnel gutters.



For all the above works, monthly inspections are carried out to ensure compliance with the E.T., while the corresponding reports include checklists and respective tables per Ministerial Decision.

10. ACCIDENTS - ACCIDENTAL POLLUTION - ACTION PLAN

An Action Plan for emergency situations has been drawn up, in which the measures for the timely collection and removal of hazardous substances after a relevant incident on the motorway are described, designed to prevent the pollution of waterways, soil, or wider environment of the motorway. The Plan is an Appendix to the Police and Firefighting Agreement entered into by the Concessionaire with the Ministry of Interior, the Police and the Fire Department and includes all the measures to be taken and the necessary equipment to be used by the Operator in case of an accident and leakage of non-biodegradable substances.

It is also pointed out that during the management of incidents with dangerous cargo, the coordination is carried out entirely by the competent teams of the Fire Department and the Traffic Police. The role of the Operator is auxiliary with a focus on the traffic management (signs, blocks, diversions) at the direction of the relevant services, the restoration of the road surface (cleaning, obstruction removal, etc.) and infrastructures (damages, safety rails restoration, etc.) and the re-opening of the relevant road after the end of the incident.

The primary and essential tool to address accidental leakage, which creates an immediate risk of surface water and soil pollution, is the use of adsorbents, such as sand, sawdust, or special geotextile immediately after the release of the hazardous load. Such materials are immediately available by the Operator, the patrol units and the maintenance contractor for direct intervention.

The decontamination process, as well as the transportation and entire management of the contaminated absorbents and the hazardous wastes produced by such an incident shall be completed in accordance with the existing legislation, by appropriately authorized companies for the decontamination, transfer and management of hazardous wastes, with the aim of timely response to highway incidents

11. SPECIAL TERMS (E.G. TANKS, DRAINAGE MANAGEMENT)

- Winter Maintenance Stations

On the PATHE motorway section, "SKARFEIA – RACHES" section, there are a total of 3 winter maintenance stations. The installed and operational stations are located in the areas of Agia Triada, Agia Marina, and Stylida.

On the Central Greece Motorway (E65) section, "LAMIA – KALAMPAKA" section, 3 winter maintenance stations are provided for. The installed and operational stations are located in the areas of Xyniada and Sofades, while the Trikala station has not yet been constructed.

- Visual disturbance by signs

All advertising billboards and signs within the concession limit have been removed. Regular inspections are carried out throughout the motorways, and the advertising billboards - signs located within the expropriation limit are removed.

- Tunnel fire safety.

There is collaboration with the Fire Department and readiness exercises are conducted under "Large-Scale" conditions, in collaboration with the Fire Department, the Highway Traffic Police, and EKAB (National Center for Emergency Care). During the year 2025, no readiness exercises were conducted.

- Pollution control units

It is noted that the temporary detention tanks for contaminated runoff in the "Total Bypass of Stylida - Karavomylos" section have been constructed, as provided by E.T. d-13 of JMD 100198/30.05.2006.

It is noted that upon completion of the State construction contracts in sections of the PATHE E65, the tanks for contaminated runoff provided for under JMD ETA 146113/12.07.2005 for the "Skarfeia – Thermopylae" section were constructed and handed over to the Concessionaire.

Correspondingly, contaminated runoff retention tanks have been constructed for the E65, in compliance with E.T. 29 and 48 of JMD 144504/18.11.2005.

It should be noted that the Concessionaire has designed and has in place a pollution response plan to be implemented in case of accidental pollution that will include the use of these tanks in application of the E.T. and its contractual obligations.

- Water Quality

Within the framework of the water-monitoring programme for the year 2025, 17 samplings were carried out in total for the E65 Motorway and for the PATHE, Spercheios section.

The samples were collected in December 2025 in special sterilised collectors with a capacity of 2 litres, supplied by the specialist laboratory ANDREOU, which also carried out the chemical analyses. More specifically, the following were carried out:

- E-65 Motorway, PATHE Spercheios section:

E65		15-16/12/2025
A	Λαμία – Μακρυχώρι	
	(ΑΕΠΟ: 142128/2005 -πρόγραμμα παρακολούθησης υδάτων έως 31/01)	
1	Ποταμός Σοφαδίτης	2
2	Σημεία Εγγειοβελτιωτικών έργων (Ξυνιάδα - Θεσσ. Κάμπος)	2
3	Λίμνη Σμοκόβου	1
4	Τάφρος Λαμίας και Σπερχειός Ποταμός	4
B	Μακρυχώρι - Καλαμπάκα	
	(ΑΕΠΟ: 145521/2005, πρόγραμμα παρακολούθησης υδάτων έως 31/01)	
1	Ποταμός Ληθαίος	2
2	Ποταμός Πηνειός	3
3	Ποταμός Καλέτζης	1
ΠΑΘΕ – Ε65		
Γ	Στυλίδα - Καραβόμυλος	
	(ΑΕΠΟ: 100198/2006, πρόγραμμα παρακολούθησης υδάτων έως 31/01)	
1	Εκβολές Σπερχειού & Κοιλιάδα	2
	ΣΥΝΟΛΟ ΜΕΤΡΗΣΕΩΝ:	17

The monitoring parameters for all samples are set out in the table below.

Monitoring parameters

ΤΥΠΟΣ ΠΑΡΑΓΟΝΤΩΝ	ΠΑΡΑΓΟΝΤΑΣ	ΜΟΝΑΔΑ ΜΕΤΡΗΣΗΣ
Λίπη και Έλαια	Λίπη και Έλαια	mg/L
	Θερμοκρασία	°C
Φυσικοχημικές αναλύσεις	pH (ενεργός οξύτητα)	4-10
	αγωγιμότητα	μS/cm
	αλατότητα	ppt
	θολερότητα	NTU
	Ολική Σκληρότητα	ΓΑΛΛΙΚΟΙ ΒΑΘΜΟΙ
Οργανικό φορτίο	BOD ₅ (βιοχημικά απαιτούμενο οξυγόνο)	mg/l
	COD (χημικά απαιτούμενο οξυγόνο)	mg/l
	ΤΟC (ολικό οργανικό φορτίο)	mg/l
	DO (Διαλυμένο Οξυγόνο)	mg/l
Στερεά	TSS (ολικά αιωρούμενα στερεά)	mg/l
	TDS (ολικά διαλυμένα στερεά)	mg/l
Θρεπτικά ιόντα	νιτρικά (NO ₃)	mg/l
	νιτρώδη (NO ₂)	mg/l
	φωσφορικά (PO ₄)	mg/l
	αμμωνιακά (NH ₄)	mg/l
	Θειικά (SO₄)	mg/l
	Φθορίου(F)	mg/l
	Χλωρίου(Cl)	mg/l
	Νατρίου(Na)	mg/l
	Καλίου(K ⁺)	mg/l
	Ασβεστίου(Ca²⁺)	mg/l
Μαγνησίου(Mg²⁺)	mg/l	
Μέταλλα	μόλυβδος Pb	μg/l
	κάδμιο Cd	μg/l
	Σίδηρος Fe	μg/l
	Αρσενικό As	μg/l

From the observation of the results, it is noted that no significant alteration was recorded with regard to the seasonality of the measurements.

It is noted that in the immediate vicinity of the motorway (both the E-65 and the PATHE), there are various sources of pollution affecting the adjacent water bodies, to which a significant proportion of the exceedances in the concentrations of certain measured parameters can be attributed. The motorway passes through many cultivated areas and also through numerous settlements, resulting in the water bodies receiving pesticides, fertilizers as

well as domestic waste. It is therefore mainly during the summer period that an increased burden on water bodies from agricultural and other anthropogenic activities in the surrounding area is likely

In summary, it is noted that for the E-65 Motorway and the PATHE Spercheios section, the 2025 sampling results indicate:

- ✓ There were no exceedances of cadmium, lead, and arsenic concentrations.
- ✓ There were no exceedances of iron concentrations, while in several cases even the drinking water limit was met.
- ✓ There were no exceedances in either BOD or COD.
- ✓ In all samples, there was no exceedance in Total Suspended Solids. Significant values were observed in the Spercheios 3 and Pineios 3 samples. The increase in Total Suspended Solids (TSS) in a river is due to a combination of natural processes and human interventions, with heavy rainfall being the primary factor. The wider area experienced an increased number of heavy storms in December 2025. Rainwater carries mud, sand, and soil. In addition, agricultural crops near the riverbanks and surface run-off from fields transport soil, organic matter, and residues of fertilisers. Taking into account the results of the other samplings, both within the current programme and in previous years, for each individual water body, we conclude that these values are not attributable to the operation of the Motorway.
- ✓ There were no exceedances of the limits for sulphate, chloride, ammonium, fluoride, and phosphate ions.
- ✓ For the Sofaditis River, all receptor limits are met except for total phosphorus, where instead of 0.2 mg/l there is a slight marginal exceedance of 0.3 mg/l for both samples. However, this very minor exceedance is not attributable to the treated wastewater from the WWTP, as the value is the same both upstream and downstream of the WWTP discharge point; therefore, the WWTP's contribution is practically zero. Furthermore, a COD exceedance was also observed at location 1, which is most likely attributable to agricultural and livestock activities through the transfer of fertilisers and organic waste from cultivated land into the waters. Moreover, the location is situated upstream of the WWTP discharge point and consequently the elevated value is not attributable to the operation of the WWTP. Finally, it should be noted that the COD value at location 2, downstream, is also within the limits.

Taking into account the overall results of all analyses, the burden on water bodies from the operation of the E65 motorway and the PATHE Spercheios section can be characterized as negligible in relation to other anthropogenic activities.

A corresponding water monitoring programme will also be carried out in 2026.

12. INSPECTION AND MAINTENANCE OF HYDRAULIC STRUCTURES

Inspections and maintenance of hydraulic works are carried out to ensure the unobstructed flow of surface water receivers (e.g., rivers, streams, torrents) at locations intersecting or related to the road alignment, through the cleaning and maintenance of existing structures. Additionally, for cross culverts, their outlets are cleared from vegetation, debris, or other transported materials to facilitate the smooth passage of fauna. Monitoring of the operational condition of all hydraulic structures is conducted through inspections/examinations for any erosion, settling, blockages, or signs of malfunction, and an evaluation of their adequacy and condition.

13. PLANTINGS – MAINTENANCE OF VEGETATION

A contract has been concluded with a Subcontractor for the maintenance and management of the vegetation and the plantings.

14. CONCESSIONAIRE'S ENVIRONMENTAL SERVICE

Autokinitodromos Kentrikis Elladas S.A. is the "Concessionaire" for the Project "Motorway of Central Greece (E65)" in accordance with the Concession Agreement.

With the Operation & Maintenance Contract dated 5/3/2021 the Concessionaire has assigned to the Operator, and the Operator has undertaken, all the obligations, rights, risks and responsibilities of the Concessionaire, under the Concession Agreement, regarding the operation and maintenance of the Concession Project under the regime of the principle of absolute correspondence of obligations (back to back).

Under the Agreement dated 30/1/2025, the Operator subcontracted part of the Motorway Operation and Maintenance services to a Maintenance Subcontractor.

In accordance with the provisions of the Concession Agreement and the Operation and Maintenance Agreement, the Concessionaire – inter alia – retains the following responsibilities:

- Monitors and supervises the fulfilment of the Environmental Requirements in accordance with the provisions of the Concession Agreement
- Submits reports and updates to the State in accordance with the provisions of the Concession Agreement.

The obligations regarding the protection of the environment during the Operations & Maintenance activities of the motorways are set out in Art. 11 of the Concession Agreement,

in Arts. 2.3 and 2.6 of the SCC and in Appendix A of the SCC (Environmental Licensing of the Project).

The ETAs are separate by motorway section and specified in terms of the needs of each area, but also in terms of the impact of the O&M of the motorway on the environment.

For the effective fulfillment of those mentioned above, an Environmental Management System is implemented, designed to cover these special requirements. The maintenance of a relevant certification according to the corresponding international standard ISO 14001 provides the possibility of maintaining in force the above environmental terms for a longer period.

This System, in synergy with the correspondingly certified Environmental Management System of the Concessionaire will cover horizontally the entire Concession Project.

For the implementation of the above, the Operator, the Maintenance Subcontractor and the Concessionaire maintain a department for Environment with specialized personnel, which is responsible for the inspection and compliance with the E.T. along the motorways. They also cooperate with a special advisor in order to create a group of scientists that covers the full spectrum of the environment. The group of scientists consists of: Civil Engineer – Transportation Expert – Acoustical Engineer, Environmentalist – Environmental Planner, and Environmentalist – Chemist – Acoustical Engineer, to fully meet the inspection needs of the E.T. for the road project.

15. REPORTS (SEMI-ANNUAL – ANNUAL SUBMISSIONS)

For the year 2025, the 1st semi-annual Report of Environmental Monitoring of the Concession Project under study was prepared, which was submitted by the Concessionaire to the Supervisory Authorities and GPDD/YPEN (D17 Receipt Ref. No. 132276-07.08.25, KSESP Receipt Ref. No.: 132331-07.08.25 & DIPA Receipt Ref. No.: 88364/5646-07.08.25).



16. MONTHLY FOLLOW-UP – CHECK LISTS

Based on the Environmental Monitoring and Control Program and the Environmental Management System, the "Tables For the Implementation of the Environmental Terms" are established, outlining the ways and methodology of the necessary actions, in order to ensure the implementation of the Environmental Terms.



Environmental supervisors, in collaboration with the project engineers, perform regular (monthly) checks and complete the check lists, i.e. the implementation of the "Environmental

Monitoring and Control Program". They also provide the necessary guidelines or directions based on the Environmental Monitoring and Control Program for any

environmental issue that arises.

After each regular (monthly) check, the corresponding checklist is filled out, which shows deviations from the implementation of the environmental terms identified by the inspections. The same table provides the proposed corrective actions. The tables are sent to the company responsible for the operation to take all necessary actions and the appropriate measures to comply with the environmental legislation and the environmental terms of the project. In the following recheck, it is examined whether all the necessary measures and the proposed corrective actions have been taken and the corresponding fields of the monthly checklist are filled in.

The Environmental Management System (EMS), which is implemented, consists of the Manual, the Procedures, the Works Instructions related to the environment and the compliance with the environmental requirements of the project. The environmental management manual, procedures and instructions are applied uniformly throughout the project and are constantly evolving to meet project needs.

17. INSPECTIONS BY ENTITIES – FINES

For the year 2025, no environmental degradation issues arising from the operation and maintenance of the motorway have been identified, and no fines have been imposed on Odos Kentrikis Elladas S.A.

18. CERTIFICATIONS

ODOS KENTRIKIS ELLADOS S.A., the Operator and the Maintenance Subcontractor have each separately developed and implemented an Integrated Management System (IMS) resulting from the integration of the Quality, Environment and Safety & Health Systems applied by each company. The aim of the IMSs is to ensure the most efficient management of quality, environmental and S&H issues by eliminating overlapping procedures and controls.

ODOS KENTRIKIS ELLADOS S.A. and the Operator, recognizing the need to operate efficiently the motorways individually, each designed a Business Continuity Plan on which they relied for the implementation of a Business Continuity Management System (BCMS). In 2020, the BCMS was certified for the international standard ISO 22301:2012, thus making it the first Concessionaire Company to receive the relevant certification. In February 2022, the BCMSs of ODOS KENTRIKIS ELLADOS S.A. and the Operator were certified against the latest version of the ISO 22301:2019 standard. For ODOS KENTRIKIS ELLADOS S.A. and the Operator, in February 2025 the initial certification of the Business Continuity Management System was carried out according to the **ISO 22301:2019** standard by the certification body Bureau Veritas.

In March 2025, the certification body Bureau Veritas carried out for ODOS KENTRIKIS ELLADOS S.A. the annual inspection of the Compliance Management System according to the **ISO 37301:2021** standard.

In July 2025, ODOS KENTRIKIS ELLADOS S.A., the Operator and the Maintenance Subcontractor were successfully inspected for the Quality Management System according to the **ISO 9001:2015** standard, for the Health & Safety Management System according to the **ISO 45001:2018** standard, and for the Environmental Management System according to the **ISO 14001:2015** standard by the certification body Bureau Veritas.

In addition, in 2015 ODOS KENTRIKIS ELLADOS S.A. designed and implemented a Road Safety Management System, which was certified according to the international standard ISO 39001:2012, which constitutes a milestone for the safe and efficient fleet management, and demonstrates the company's commitment to implement safe practices on the motorway. From 2021 until March 2025, the system was implemented by the Operator, and subsequently by the Maintenance Subcontractor. For the Maintenance Subcontractor, in July 2025 the

Certification inspection for the Road Safety Management System according to the **ISO 39001:2012** standard was carried out by the certification body Bureau Veritas.

Collectively, ODOS KENTRIKIS ELLADOS S.A., the Operator and the Maintenance Subcontractor are certified according to the following Management Systems Standards:

ODOS KENTRIKIS ELLADOS S.A.

- ISO 37301 (Regulatory Compliance Management System).
- ISO 9001 (Quality Management System).
- ISO 45001 (Health & Safety Management System).
- ISO 14001 (Environmental Management System).
- ISO 22301 (Business Continuity Management System).

OPERATOR

- ISO 9001 (Quality Management System).
- ISO 45001 (Health & Safety Management System).
- ISO 14001 (Environmental Management System).
- ISO 22301 (Business Continuity Management System).

MAINTENANCE SUBCONTRACTOR

- ISO 9001 (Quality Management System).
- ISO 45001 (Health & Safety Management System).
- ISO 14001 (Environmental Management System).
- ISO 39001 (Road Safety Management System).

Following the above inspections, the independent bodies recommended the continuance of the Certifications for all standards and for at least one year until the next scheduled annual inspections are carried out.



19. EXPENSES COVERAGE

The required percentage of the total operating and maintenance budget of the motorway required to fully comply with the Environmental Terms and restrictions of the relevant JMD-ETA has been secured as a matter of priority. Expenditure on environmental protection projects is given in the annual progress reports on compliance with the Environmental Terms. Details of expenses on the Environment are set out in Appendix II.

20. CORPORATE SOCIAL RESPONSIBILITY

ODOS KENTRIKIS ELLADOS S.A. compiles a Corporate Responsibility Report in accordance with the Global Reporting Initiative (GRI) standard, the GRI Standards, and meets the Baseline Selection criteria (in accordance: Core option).

The Report covers all the core and substantial issues that the company has identified and focuses on, including environmental issues.

The Reports are issued on an annual basis and cover the 4 Corporate Responsibility pillars for Operation & Maintenance activities:

- Road Safety and Quality of Services
- Human Resources
- Caring for the Environment
- Contribution to Society

The Corporate Responsibility Report is posted at: <http://www.kentrikiodos.gr>.



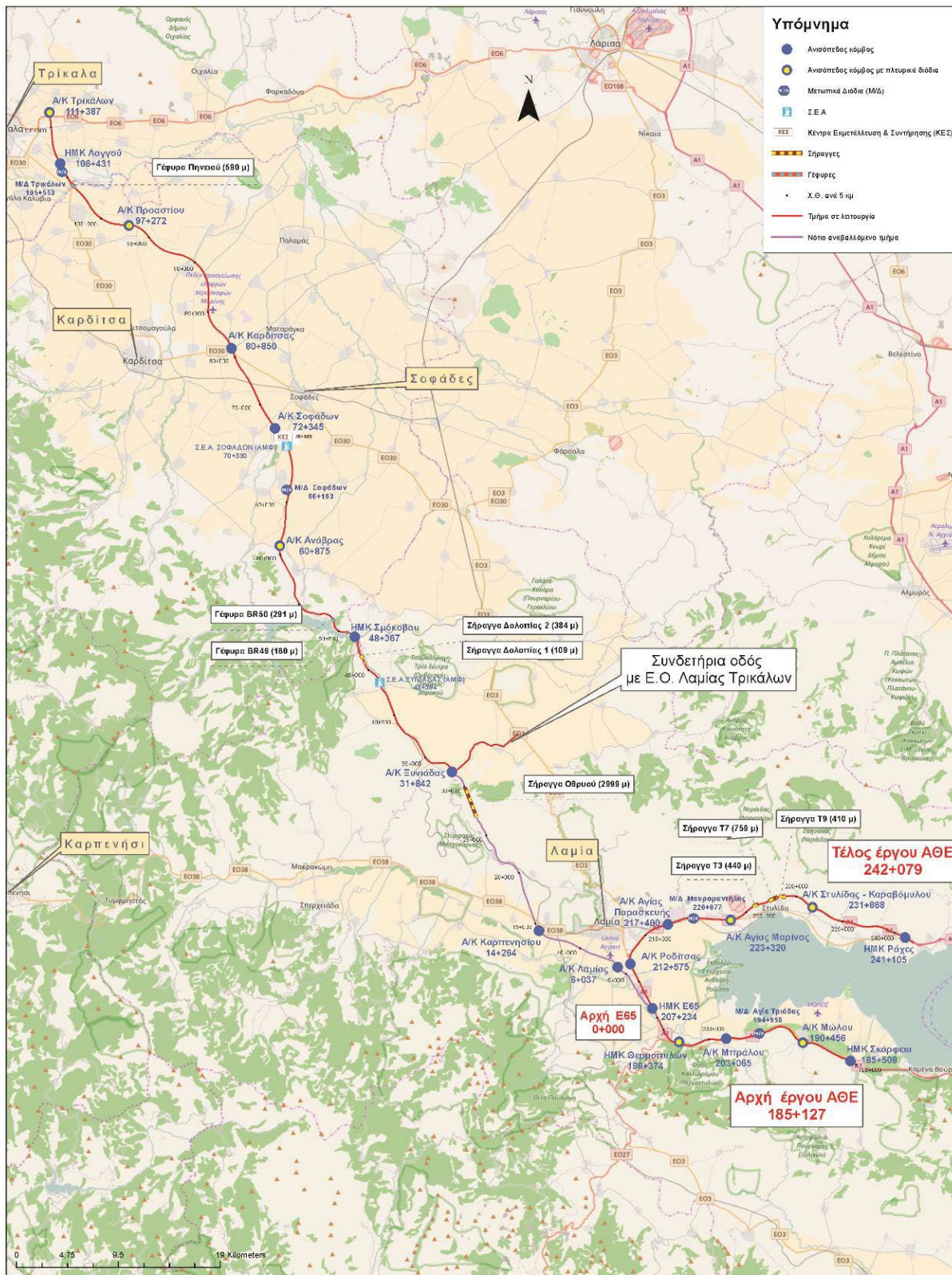
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21. APPENDICES

Appendix I



Αυτοκινητόδρομος ΑΘΕ (Σκάρφεια - Ράχες) & Ε65